

Marc E. Wolin, Esq.
[mwolin@saiber.com](mailto:mwol@saiber.com)
John M. August, Esq.
jaugust@saiber.com
SAIBER LLC
18 Columbia Turnpike, Suite 200
Florham Park, NJ 07932
Tel: (973) 622-8401

-and-

Joseph D. Satterley, Esq. (Pro Hac Vice Pending)
jsatterley@kazanlaw.com
KAZAN, McCLAIN, SATTERLEY & GREENWOOD
A Professional Law Corporation
Jack London Market
55 Harrison Street, Suite 400
Oakland, CA 94607
Tel: (510) 302-1000

Counsel for Movant Anthony Hernandez Valadez

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:	:	Chapter 11
	:	
LTL MANAGEMENT LLC,	:	Case No. 23-12825 (MBK)
	:	
Debtor.	:	Judge: Michael B. Kaplan
	:	

DECLARATION OF JOSEPH D. SATTERLEY

Pursuant to 28 U.S.C. § 1746, I, Joseph D. Satterley, declare under penalty of perjury as follows:

1. I am a partner in the law firm of Kazan, McClain, Satterley & Greenwood, A Professional Law Corporation (“Kazan Law”), located at 55 Harrison Street, Suite 400, Oakland, California 94607, and have been duly admitted to practice law in the States of Pennsylvania, Kentucky, and California, the United States Supreme Court, the U.S. District Court for the Eastern and Western Districts of Kentucky, and the U.S. Court of Appeals for the Third, Sixth,

Eighth, and Ninth Circuits. I have an application pending for admission as *pro hac vice* counsel for Movant Anthony Hernandez Valadez (“Movant” or “Mr. Valadez”).

2. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein. If called as a witness, I would testify as to those facts.

3. I submit this Declaration in support of Movant’s reply (“Reply”) to the oral objection (“Objection”) of Debtor LTL Management LLC (“Debtor”) to Movant’s motion (the “Motion”) For an Order (I) Granting Relief From the Automatic Stay, Third Amended Ex Parte Temporary Restraining Order, and Anticipated Preliminary Injunction, and (II) Waiving the Fourteen Day Stay Under Federal Rule of Bankruptcy Procedure 4001(a)(3).

4. Attached hereto as **Exhibit 31** is a true and correct copy of the Ambry Genetics Final Report regarding Movant, dated April 11, 2023. Movant first learned about his genetic testing results on April 14, 2023, when he had a visit with his treating doctor. Undersigned counsel did not learn of this document’s existence until April 15, 2023.

5. Attached hereto as **Exhibit 32** is a true and correct copy of the relevant excerpts from the transcript of Dr. Leah Backhus’ deposition testimony, taken on March 8, 2023, in *Valadez v. Johnson & Johnson*, Alameda County, California, Superior Court, Case No. 22CV012759 (“Valadez”).

6. Attached hereto as **Exhibit 33** is a true and correct copy of Movant’s Response to Defendants’ Opposition to Trailblazer Studios’ Request to Record Trial Proceedings in *Valadez*, filed on March 23, 2023.

7. Attached hereto as **Exhibit 34** is a true and correct copy of Movant’s Opposition to Joint Defendants’ Motion in Limine No. 2 to Exclude References to LTL Management LLC’s Bankruptcy in *Valadez*, filed on April 3, 2023.

8. Attached hereto as **Exhibit 35** is a true and correct copy of the relevant excerpts from the transcript of Dr. Barry Horn's deposition testimony, taken on April 15, 2021, in *Prudencio v. Johnson & Johnson*, Alameda County, California, Superior Court, Case No. RG20061303.

9. Attached hereto as **Exhibit 36** is a true and correct copy of the relevant excerpts from the transcript of Dr. Barry Horn's deposition testimony in *Valadez*, taken on March 27, 2023.

10. Attached hereto as **Exhibit 37** is a true and correct copy of the relevant excerpts from the Reporter's Transcript of Proceedings in this case, taken on April 11, 2023.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. I executed this Declaration on April 17, 2023, in New York, New York.

By: /s/ Joseph D. Satterley
JOSEPH D. SATTERLEY